IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
ν .)	
) No. 1:17-cr-270-LN	ИΒ
AHMED AMEER MINNI,		
RAMY SAID ZAMZAM and)	
AMAN HASSAN YEMER.)	
)	
Defendants.)	

SECOND MOTION OF THE UNITED STATES TO CERTIFY CASE AS COMPLEX UNDER THE SPEEDY TRIAL ACT

On September 12, 2022, the government filed a motion to certify this case as complex under the Speedy Trial Act. Dkt. 69. On September 13, 2022, this Honorable Court issued an order declaring this a complex case. Dkt. 73. That order excluded the time from September 7, 2022, through December 9, 2022, in computing the time within which the trial must commence. The reasons justifying excluding this time under the Speedy Trial Act described in the order dated September 13, 2022, still exist in this case, and the government adopts and incorporates by reference the reasons articulated in its motion at Dkt. 69.

As noted in the government's prior motion, given the nature of the crimes allegedly committed by these five defendants, there is a large volume of complex discovery in this case. The government has already begun producing to defense counsel voluminous discovery, and the next production, which is imminent, will consist of more than 28,000 documents. It should also be noted that none of the three defendants are currently incarcerated. The government agreed to their pretrial release at their initial appearances.

Therefore, the United States requests that the Court certify the case as unusual and complex and find that the ends of justice served by scheduling a trial beyond the 70-day deadline of the Speedy Trial Act outweigh the best interests of the public and the defendants in a speedy trial. The United States further requests that the Court exclude the time from December 9, 2022, until the next status conference, scheduled for February 14, 2023. A proposed order is submitted herewith for the convenience of the Court.

Respectfully submitted,

Jessica D. Aber United States Attorney

By: /s/ John T. Gibbs
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CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2023, I electronically filed this motion with the Clerk of Court using the CM/ECF system, which will transmit a Notice of Electronic Filing to all counsel of record in this case.

/s/ John T. Gibbs

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